

Michael L. Schrag (SBN 185832)
Steve Lopez (SBN 300540)
GIBBS LAW GROUP LLP
505 14th Street, Suite 1110
Oakland, California 94612
Telephone: (510) 350-9700
Facsimile: (510) 350-9701
mls@classlawgroup.com
sal@classlawgroup.com

Hirlye R. "Ryan" Lutz, III (*pro hac vice*)
F. Jerome Tapley (*pro hac vice*)
Adam W. Pittman (*pro hac vice*)
Brett C. Thompson (*pro hac vice*)

CORY WATSON, P.C.
2131 Magnolia Avenue South
Birmingham, Alabama 35205
Telephone: (205) 328-2200
Facsimile: (205) 324-7896

Attorneys for Plaintiffs

[Additional counsel listed on signature page]

Benedict Y. Hur (SBN 224018)
Travis Silva (SBN 295856)
Bevan A. Dowd (SBN 308611)
**KEKER, VAN NEST & PETERS
LLP**
633 Battery Street
San Francisco, CA 94111-1809
Telephone: (415) 391-5400
Facsimile: (415) 397-7188
bhur@keker.com
tsilva@keker.com
bdowd@keker.com

Attorneys for Defendants

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

CATHY O'BRIEN and LAURA ADNEY,
on behalf of themselves and all others
similarly situated,

Plaintiffs,

v.

POPSUGAR INC. and POPSUGAR MEDIA
INC.,

Defendants.

Case No. 4:18-cv-04405-HSG

**STIPULATION TO EXTEND DEADLINE
(LOCAL RULE 6-2)**

Date: November 8, 2018
Time: 2:00 p.m.
Courtroom: 2 – 4th Floor
Judge: Hon. Haywood S. Gilliam, Jr.
Action Removed: July 20, 2018

1 Plaintiffs Cathy O'Brien and Laura Adney, and Defendants POPSUGAR Inc. and
2 POPSUGAR MEDIA Inc. hereby stipulate as follows:

3 WHEREAS, Plaintiffs filed a proposed class action, *O'Brien v. Popsugar Inc.*, on June 7,
4 2018 in the Superior Court for the County of Santa Clara, and Defendants removed this case to
5 this Court on July 20, 2018;

6 WHEREAS, on July 26, 2018, the parties stipulated to extend Defendants' time to
7 respond to Plaintiffs' complaint until October 10, 2018;

8 WHEREAS, on August 7, 2018, the Court related the *O'Brien* litigation to *Batra v.*
9 *POPSUGAR Inc.*, No. 18-cv-03752, filed on June 25, 2018;

10 WHEREAS, on August 16, 2018, Plaintiffs filed a motion to remand this case to state
11 court, and on August 30, 2018, Defendants filed their opposition to this motion;

12 WHEREAS, Plaintiffs' reply in support of their remand motion is currently set for
13 September 6, 2018 and Plaintiffs' remand motion is currently set for hearing on November 8,
14 2018; and

15 WHEREAS, given the Labor Day holiday and deadlines in other cases, the parties have
16 agreed to extend Plaintiffs' time to file their reply memorandum by 7 days, up to and including
17 September 13, 2018.

18 THE PARTIES HEREBY STIPULATE AND AGREE, subject to the Court's approval,
19 that:

- 20 1. Plaintiffs' time to file their reply memorandum in support of their motion to
21 remand is extended until September 13, 2018.

22 IT IS SO STIPULATED.

23
24 DATED: September 6, 2018

Respectfully submitted,

25 **GIBBS LAW GROUP LLP**

26 By: /s/ Michael L. Schrag

27 Michael L. Schrag
28 Steve Lopez

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CORY WATSON, P.C.

2131 Magnolia Avenue South
Birmingham, Alabama 35205
Telephone: (205) 328-2200
Facsimile: (205) 324-7896

Attorneys for Plaintiffs

DATED: September 6, 2018

KEKER, VAN NEST & PETERS LLP

By: /s/ Travis Silva

Benedict Y. Hur (SBN 224018)
Travis Silva (SBN 295856)
Bevan A. Dowd (SBN 308611)
633 Battery Street
San Francisco, CA 94111-1809
Telephone: (415) 391-5400
Facsimile: (415) 397-7188
bhur@keker.com
tsilva@keker.com
bdowd@keker.com

Attorneys for Defendants

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I, Michael L. Schrag, declare as follow:

1. I am a member in good standing of the California State Bar and a partner at the law firm of Gibbs Law Group LLP, counsel for Plaintiffs in this action. I made this declaration based on my personal knowledge, and if called to testify to the contents below, I would and would do so.

2. On August 17, 2018, Plaintiffs filed a motion to remand this case to state court. The motion is set for hearing on November 8, 2018.

3. Pursuant to Civil L.R. 7-3(c), Plaintiffs' reply in support of the motion is currently due on September 6, 2018.

4. The parties agree that due to the Labor Day holiday and counsel's schedule, an extension of Plaintiffs' reply deadline is appropriate. Specifically, the parties agree that Plaintiffs' time to file a reply in support of their motion should be extended by 7 days to September 13, 2018.

5. The only prior time modification in the case was a stipulation extending the deadline for Defendants to respond to the Complaint by seventy-five days. The requested time modification would not have any impact on the schedule for the case.

I declare under penalty of perjury under the laws of the United States of America that the foregoing facts are true and correct and this declaration was executed on the 5th day of September 2018 in Oakland, California.

By: /s/ Michael L. Schrag

1 **ATTESTATION OF E-FILED SIGNATURE**

2 I, Michael L. Schrag, am the ECF USER whose ID and password are being used to file
3 the foregoing document. In compliance with Civil L.R. 5-1(i)(3), I hereby attest that the other
4 signatories listed above have concurred in this filing.

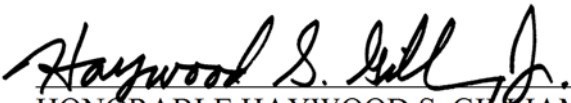
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6 DATED: September 6, 2018

By: /s/ Michael L. Schrag

7 * * *

8
9 PURSUANT TO STIPULATION, IT IS SO ORDERED.

10
11 Dated: September 6, 2018

12 
13 HONORABLE HAYWOOD S. GILLIAM, JR.
14 United States District Court Judge